

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO. 1:16-CR-00224
)	
Plaintiff,)	JUDGE GAUGHAN
)	
vs.)	
)	<u>DEFENDANT RADU MICLAUS'</u>
)	<u>SECOND</u>
RADU MICLAUS, et al.)	<u>MOTION FOR EXTENSION OF</u>
)	<u>TIME TO RESPOND TO OR</u>
Defendants.)	<u>FILE OBJECTIONS TO</u>
)	<u>PRESENTENCE INVESTIGATION</u>
)	<u>REPORT</u>
)	

Now comes Defendant Radu Miclaus (the "Defendant"), by and through counsel, and, for the second time, hereby respectfully moves this Court for an extension of time by which to respond to the initial Presentence Investigation Report filed on July 12, 2019 (the "PSI Report"), for the following reasons.

First, a brief review of the PSI indicates that there still is a glaring typo on the report. The undersigned has communicated that typo to the PSI Officer, and it is the understanding of the undersigned that a corrected PSI will be issued very shortly.

Second, as of the writing of this motion, the probation officer still has not been able to deliver any victim impact statements for evaluation by the undersigned. As of August 8, 2019, the probation officer is claiming (due to ongoing technical

difficulties) that the victim impact statements (which will obviously impact loss among other things) are going to be mailed overnight to the undersigned and other defense counsel. As of writing of this motion, the undersigned has no idea whatsoever what those statements will contain.

Third, the Sentencing Memorandum delivered by the United States for the Defendant on July 31, 2019 is 209 pages long, and the Sentencing Memorandum for co-defendant Tiberiu Danet is 136 pages long. The undersigned needs further study of these lengthy documents in order to determine whether the objections to the PSI require an analysis and/or rejection of the positions set forth in those documents.

Fourth, the undersigned has contacted the Government on this request, and the Government has no objection to this motion.

For the foregoing reasons, the Defendant respectfully moves this Court to extend the deadline for filing objections until Monday, August 12, 2019.

Respectfully submitted;

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing has been filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic record. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic system.

S/Michael J. O'Shea

Michael J. O'Shea